

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

**Linda Hoekman**, et al.,

Plaintiffs,

v.

**Education Minnesota**, et al.,

Defendants.

Case No. 0:18-cv-01686-SRN-SER

**PLAINTIFFS' UNOPPOSED MOTION TO FILE CORRECTED  
SUPPLEMENTAL BRIEF REGARDING THE CONTINUED  
SEALING OF DOCKET ENTRIES 95-1, 111-1, 111-2, AND 111-3**

On February 18, 2020, the plaintiffs filed their supplemental brief regarding the continued sealing of docket entries 95-1, 111-1, 111-2, and 111-3, in accordance with this Court's order of February 5, 2020.

The brief that the plaintiffs submitted yesterday, however, describes the retainer agreements and litigation-financing agreements as if they are currently under an "attorneys' eyes only" designation. Although those documents were initially designated as "attorneys' eyes only," that designation was changed to "confidential" in this Court's orders of August 22, 2019 (ECF No. 84), and September 10, 2019 (ECF No. 89). The plaintiffs respectfully move to submit a corrected supplemental brief that accurately describes the current "confidential" designation of these documents.

The defendants have also asked us to clarify that the Macpherson report was initially designated confidential by the defendants—and not the plaintiffs—because the report mentioned the Rule 30(b)(6) deposition that union wished to keep confidential. We have added language to the proposed corrected brief that makes clear that the initial confidential designation was made at the defendants' and not the plaintiffs' behest.

A copy of the proposed corrected brief is attached to this motion, with all edits appearing in redline. We have conferred with the defendants and they are unopposed to this motion.

Respectfully submitted.

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Dated: February 20, 2020

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## MEET-AND-CONFER STATEMENT

I certify that I conferred with Amanda Lynch, counsel for the defendants, and she informed me that the defendants are unopposed to this motion.

/s/ Jonathan F. Mitchell  
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## CERTIFICATE OF SERVICE

I certify that on February 20, 2020, I served this document through CM/ECF

upon:

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